

REMARKS

Claims 1-263, 265-273, and 291-295 are pending in the application.

All amendments and remarks are made in a good faith effort to advance the prosecution on the merits.

Applicant respectfully requests that the amendments submitted herein be entered, and further requests reconsideration in light of the amendments and remarks contained herein.

Claim Rejections - 35 USC § 112

Claims 98 and 102 are rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

In response, claims 98 and 102 have been amended to remedy the lack of antecedent basis. Reconsideration and withdrawal of the rejection are respectfully requested.

Claim Rejections - 35 USC § 102

Claims 1-263, 265-273 and 291-295 are rejected under 35 U.S.C. 102(e) as being anticipated by Andrews et al (U.S. PG Pub No. 2004/0002883).

The examiner argued that, per claims 1 and 295, Andrews et al teach a system having a processor, memory operative with the processor, and storage media operative with the processor, the system further comprising: a business framework; a database framework operative with the business framework; and a client framework operative with the business framework; wherein the business framework, the database framework, and the client framework form an enterprise system framework (*see abstract, figs -9, 12A, 13A, 30, 31A, 31B, 42A, 42B, 43 and accompanied paragraphs, in addition see paragraphs 0004, 0060, 0061, 0074-0092, 0189-0202*)

The rejection is respectfully traversed. Applicants are a bit puzzled by the examiner's arguments. In particular, the Andrews reference only has four figures and 73 paragraphs. The examiner's argument referenced paragraphs and figures that are not in the Andrews reference. Nevertheless, Applicants reviewed the Andrews reference and found that it did not contain (in the text or the drawings) a database framework or a client framework operative with the business framework. Consequently, Applicants respectfully submit that Andrews does not anticipate all of the elements of claims 1 and 295. Reconsideration and withdrawal of the rejection are respectfully requested.

As per claims 2-8, Andrews et al teach a system wherein the enterprise system framework includes one or more rapid development services that include one or more developer services to allow one or more developers to execute the enterprise system framework from a local computer system without configuring the enterprise system framework and security, to debug one or more stored procedures to develop the business framework to generate a business framework abstraction of the business framework (*see abstract, figs -9, 12A, 13A, 30, 31A, 31B, 42A, 42B, 43 and accompanied paragraphs, in addition see paragraphs 0004, 0060, 0061, 0074-0092, 0189-0202*).

Again, Applicants have carefully reviewed the Andrews reference, and that application simply does not contain the description of databases, enterprise systems (let alone their frameworks), rapid development services (which weren't even mentioned at all in Andrews), and developer services, etc. Consequently, Applicants respectfully submit that Andrews does not anticipate all of the elements of claims 2-8. Reconsideration and withdrawal of the rejection are respectfully requested.

The examiner argued that, per claims 9, 10, Andrews et al teach a system wherein the business framework abstraction allows the business framework to modify one or more business framework services that the business framework provides to one or more business objects, to modify a business framework methodology (*see abstract, figs -9, 12A, 13A, 30, 31A, 31B, 42A, 42B, 43 and accompanied paragraphs, in addition see paragraphs 0004, 0060, 0061, 0074-0092, 0189-0202*).

Again, Applicants have carefully reviewed the Andrews reference, and that application simply does not contain the description of databases and enterprise systems (and their frameworks) and rapid development services, developer services, etc. as required in the independent and one or more intermediate claims. Consequently, Applicants respectfully submit that Andrews does not anticipate all of the elements of claims 9 and 10. Reconsideration and withdrawal of the rejection are respectfully requested.

The examiner argued that, per claims 11-35, Andrews et al teach a system wherein a set of central services on the one or more business objects includes administrative services allow the business framework to track system usage provides a set of central services for one or more business objects includes transaction services provided by a COM+ transaction server and business framework include security services to control user access to the one or more business objects, security services to control user access to one or more external objects, one or more database one or more client objects and wherein the security services utilize one or more services provided by an external service provider, are abstracted from an external service provider's implementation wherein security services include automatic generation of special components that form walls around the one or more business objects to control access to the one or more business objects includes organizational services a compulsory belonging of business objects to one or more business groups identifying business objects as belonging to the client framework compulsory naming conventions for the one or more business objects protocol services enable a protocol to be abstracted from communication between the one or more business objects and the client framework, an external framework a database framework, one or more client objects to use different protocols based on a special group to which they belong (*see abstract, figs -9, 12A, 13A, 30, 31A, 31B, 42A, 42B, 43 and accompanied paragraphs, in addition see paragraphs 0004, 0060, 0061, 0074-0092, 0189-0202*).

Again, Applicants have carefully reviewed the Andrews reference, and that application simply does not contain the description of databases and enterprise systems (and their frameworks), rapid development services, and developer services, etc. as required in the independent and one or more intermediate claims. Moreover, a quick search through the text of Andrews (provided by the Patent Office's web server) reveals that the word "protocol" was not mentioned -- not once. Applicants respectfully suggest that Andrews does not (and cannot) be

read to describe the various elements, services and protocols required in claims 11-35. Consequently, Applicants respectfully submit that Andrews does not anticipate all of the elements of claims 11-35. Reconsideration and withdrawal of the rejection are respectfully requested.

The examiner argued that, per claims 36-39, Andrews et al teach a system wherein the one or more business objects are distributed on more than one server, more than one client, database external object (*see abstract, figs -9, 12A, 13A, 30, 31A, 31B, 42A, 42B, 43 and accompanied paragraphs, in addition see paragraphs 0004, 0060, 0061, 0074-0092, 0189-0202*).

Again, Applicants have carefully reviewed the Andrews reference, and that application simply does not contain the description of databases and enterprise systems (led alone their frameworks), rapid development services, and developer services, etc. as required in the independent and one or more intermediate claims. Consequently, Applicants respectfully submit that Andrews does not anticipate all of the elements of claims 36-39. Reconsideration and withdrawal of the rejection are respectfully requested.

The examiner argued that, per claims 40-48, Andrews et al teach a system wherein the set of central services includes adapter services allow the one or more business objects to invoke other computer systems include computer systems implementing the database framework, include computer systems implementing an external framework (*see abstract, figs -9, 12A, 13A, 30, 31A, 31B, 42A, 42B, 43 and accompanied paragraphs, in addition see paragraphs 0004, 0060, 0061, 0074-0092, 0189-0202*).

Again, Applicants have carefully reviewed the Andrews reference, and that application simply does not contain the description of databases, enterprise systems (and frameworks), rapid development services, and/or developer services, etc. as required in the independent and one or more intermediate claims. Consequently, Applicants respectfully submit that Andrews does not anticipate all of the elements of claims 40-48. Reconsideration and withdrawal of the rejection are respectfully requested.

The examiner argued that, per claims 49-54, Andrews et al teach a system wherein the set of central services on the business objects includes error-handling services support a capture of one or more operating system exceptions a capture of one or more COM errors, include logging errors in an event viewer when errors are captured logging errors in an event viewer when errors are detected generating at least one call stack (*see abstract, figs -9, 12A, 13A, 30, 31A, 31B, 42A, 42B, 43 and accompanied paragraphs, in addition see paragraphs 0004, 0060, 0061, 0074-0092, 0189-0202*).

Again, Applicants have carefully reviewed the Andrews reference, and that application simply does not contain the description of databases, enterprise systems (and their frameworks), rapid development services, and/or developer services, etc. as required in the independent and one or more intermediate claims. Consequently, Applicants respectfully submit that Andrews does not anticipate all of the elements of claims 49-54. Reconsideration and withdrawal of the rejection are respectfully requested.

The examiner argued that, per claims 55-63, Andrews et al teach a system wherein the set of central services includes layering services include a client framework layer an external framework layer a reporting system layer a client framework layer, an external framework layer, and a reporting system layer, enables the client framework and the business framework in an optimized manner includes having the client framework and the business framework interact with a minimum of round-trips in an abstracted fashion (*see abstract, figs -9, 12A, 13A, 30, 31A, 31B, 42A, 42B, 43 and accompanied paragraphs, in addition see paragraphs 0004, 0060, 0061, 0074-0092, 0189-0202*).

Again, Applicants have carefully reviewed the Andrews reference, and that application simply does not contain the description of databases, enterprise systems (and their frameworks), rapid development services, and/or developer services, etc. as required in the independent and one or more intermediate claims. Consequently, Applicants respectfully submit that Andrews does not anticipate all of the elements of claims 55-63. Reconsideration and withdrawal of the rejection are respectfully requested.

As per claims 64-72, Andrews et al teach a system wherein the set of central services on business objects includes life-cycle services include notifying

the one or more business objects before and after the business objects are created, updated, deleted fetched (*see abstract, figs -9, 12A, 13A, 30, 31A, 31B, 42A, 42B, 43 and accompanied paragraphs, in addition see paragraphs 0004, 0060, 0061, 0074-0092, 0189-0202*).

Again, Applicants have carefully reviewed the Andrews reference, and that application simply does not contain the description of databases, enterprise systems (and their frameworks), rapid development services, and/or developer services, etc. as required in the independent and one or more intermediate claims. Consequently, Applicants respectfully submit that Andrews does not anticipate all of the elements of claims 64-72. Reconsideration and withdrawal of the rejection are respectfully requested.

The examiner argued that, per claims 72-84, Andrews et al teach a system wherein the set of central services includes rapid development services allow the one or more business objects that are/are not tied to a database to be generated automatically consist of a layer of non-generated code and a layer of generated-if-not-existing code provides generic services for the business object to make copies of themselves automatically guarantees that the layer of generated code implements one or more certain services contains services to assist the layer of generated code and the layer of generated-if-not-existing code are created by a third-party tool is overwritten by a developer (*see abstract, figs -9, 12A, 13A, 30, 31A, 31B, 42A, 42B, 43 and accompanied paragraphs, in addition see paragraphs 0004, 0060, 0061, 0074-0092, 0189-0202*).

Again, Applicants have carefully reviewed the Andrews reference, and that application simply does not contain the description of databases, enterprise systems (and their frameworks), rapid development services, and/or developer services, etc. as required in the independent and one or more intermediate claims. Consequently, Applicants respectfully submit that Andrews does not anticipate all of the elements of claims 72-84. Reconsideration and withdrawal of the rejection are respectfully requested.

The examiner argued that, per claims 85-97, Andrews et al teach a system wherein the state/stateless objects can encapsulate one row of a database table such that encapsulation is done within the layer of generated code for the state object can automatically contain one or more get member functions where the

member functions match a database schema where the member functions match a database schema, wherein the member variables are objects when a corresponding database type is a calendar generated code can contain status flags wherein the collection of state objects encapsulate zero or more state objects compile-time bound to a corresponding state object is implemented using a container algorithm is abstracted into a separate object (*see abstract, figs -9, 12A, 13A, 30, 31A, 31B, 42A, 42B, 43 and accompanied paragraphs, in addition see paragraphs 0004, 0060, 0061, 0074-0092, 0189-0202*).

Again, Applicants have carefully reviewed the Andrews reference, and that application simply does not contain the description of databases, enterprise systems (and their frameworks), rapid development services, and/or developer services, etc. as required in the independent and one or more intermediate claims. Consequently, Applicants respectfully submit that Andrews does not anticipate all of the elements of claims 85-97. Reconsideration and withdrawal of the rejection are respectfully requested.

The examiner argued that, per claims 98-110, Andrews et al teach a system wherein the services allow run-time binding of business objects to inherit from each other convert automatically from one business object to another, enable automatic replay of deadlock database errors when detected to keep copies, optionally and automatically, of their old state includes messaging services to send messages to other users include message queue services enable asynchronous method invocation between business objects to be invoked immediately and in the event of a failure available even when an application is not configured in a transaction server (*see abstract, figs -9, 12A, 13A, 30, 31A, 31B, 42A, 42B, 43 and accompanied paragraphs, in addition see paragraphs 0004, 0060, 0061, 0074-0092, 0189-0202*).

Again, Applicants have carefully reviewed the Andrews reference, and that application simply does not contain the description of databases, enterprise systems (and their frameworks), rapid development services, and/or developer services, etc. as required in the independent and one or more intermediate claims. Consequently, Applicants respectfully submit that Andrews does not anticipate all of the elements of claims 98-110. Reconsideration and withdrawal of the rejection are respectfully requested.

The examiner argued that, per claims 111-120, Andrews et al teach a system wherein the set of central services for the business objects include asynchronous services include an ability for business objects to invoke each other in an asynchronous manner do not preclude the ability for one or more business objects to invoke each other in a synchronous manner are available if an application is not configured in a transaction server are optimized for high-performance communication includes scheduling services allow business objects to be invoked once at a given date and time includes reporting services allow integration with an external report application provide rapid development for reports include an external report application having binding functions in state objects (*see abstract figs -9, 12A, 13A, 30, 31A, 31B, 42A, 42B, 43 and accompanied paragraphs, in addition see paragraphs 0004, 0060, 0061, 0074-0092, 0189-0202*).

Again, Applicants have carefully reviewed the Andrews reference, and that application simply does not contain the description of databases, enterprise systems (and their frameworks), rapid development services, and/or developer services, etc. as required in the independent and one or more intermediate claims. Consequently, Applicants respectfully submit that Andrews does not anticipate all of the elements of claims 111-120. Reconsideration and withdrawal of the rejection are respectfully requested.

The examiner argued that, per claims 121-129, Andrews et al teach a system wherein the database framework consists of one or more stored procedures, one or more user-defined types, one or more tables, and one or more views in a relational database all access to the database framework is through the stored procedures, the user-defined types, tables, and views all follow one or more naming conventions allow a third-party tool to identify all insert stored procedures, all update stored procedures, all delete stored procedures, and all query stored procedures that correspond to each table and to each view in the database allows a third-party tool to generate automatically all insert stored procedures, update stored procedures, and all delete stored procedures that correspond to all tables and views wherein the generation allows the stored procedures to support simultaneous access by multiple users keeping history automatically more services rapidly wherein the user-defined types enables one or more database columns to identify themselves as components within a unit system (*see abstract, figs -9, 12A, 13A, 30, 31A, 31B, 42A, 42B, 43 and accompanied paragraphs, in addition see paragraphs 0004, 0060, 0061, 0074-0092, 0189-0202*).

Again, Applicants have carefully reviewed the Andrews reference, and that application simply does not contain the description of databases, enterprise systems (and their frameworks), rapid development services, and/or developer services, etc. as required in the independent and one or more intermediate claims. Consequently, Applicants respectfully submit that Andrews does not anticipate all of the elements of claims 121-129. Reconsideration and withdrawal of the rejection are respectfully requested.

The examiner argued that, per claims 130-156, Andrews et al teach a system wherein the client framework provides rapid development services for the client framework enable the client framework to change one or more central services for one or more client forms and one or more client dialogs en masse a set of central services for client forms, client dialogs, and HTML pages includes abstraction services to abstract client forms and client dialogs from a web browser that hosts the client forms and the client dialogs providing life-cycle services notifying/allowing the client forms and the client dialogs to initialize/override the client forms and the client dialogs and further notifying the client forms and the client dialogs when a command such and get, save, refresh, delete command is invoked wherein the set of central services include performance services include caching services caching services include routing all outbound calls through a cache so that an outbound call need not be made if one or more results are already in the cache written in C++ wherein the performance services include asynchronous services include services which enable one or more client objects to invoke one or more server objects in an asynchronous manner downloading services enable the downloading of the client forms and other objects as a background process making the client forms, the client dialogs and the client framework lightweight include using the business objects natively (*see abstract, figs -9, 12A, 13A, 30, 31A, 31B, 42A, 42B, 43 and accompanied paragraphs, in addition see paragraphs 0004, 0060, 0061, 0074-0092, 0189-0202*).

Again, Applicants have carefully reviewed the Andrews reference, and that application simply does not contain the description of databases, enterprise systems (and their frameworks), rapid development services, and/or developer services, etc. as required in the independent and one or more intermediate claims. Consequently, Applicants respectfully submit that Andrews does not anticipate all of the elements of claims 130-156. Reconsideration and withdrawal of the rejection are respectfully requested.

The examiner argued that, per claims 157-167, Andrews et al teach a system wherein the central services include persistence services allow HTML page state to be preserved rapid development services include automatic updating of a status flag of the one or more business objects property services enable one or more controls on HTML pages to exhibit behavior based on properties defined for the control allows the client forms and the client dialogs to invoke business objects without coding includes loading one or more controls from specific business object data, taking action on a control selection, taking action when a get, a save, a delete, a refresh, and a history command is invoked wherein the rapid development services, the client forms and the client dialogs are written in Visual Basic include integration with a deployment apparatus to discover all binaries needing to be installed on a client machine (*see abstract, figs -9, 12A, 13A, 30, 31A, 31B, 42A, 42B, 43 and accompanied paragraphs, in addition see paragraphs 0004, 0060, 0061, 0074-0092, 0189-0202*).

Again, Applicants have carefully reviewed the Andrews reference, and that application simply does not contain the description of databases, enterprise systems (and their frameworks), rapid development services, and/or developer services, etc. as required in the independent and one or more intermediate claims. Consequently, Applicants respectfully submit that Andrews does not anticipate all of the elements of claims 157-167. Reconsideration and withdrawal of the rejection are respectfully requested.

The examiner argued that, per claims 168-178, Andrews et al teach a system wherein an external framework operates within an enterprise application interface provides a set of central services includes protocol services include a protocol framework for incorporating new protocols into the system wherein the set of central services includes communication services include synchronous invocation services wherein the synchronous invocation services allow synchronous method invocation between objects within the external framework and one or more external clients wherein the communication services include subscribe/publish invocation services include subscribe invocation services allow external framework objects to publish events asynchronously (*see abstract figs -9, 12A, 13A, 30, 31A, 31B, 42A, 42B, 43 and accompanied paragraphs, in addition see paragraphs 0004, 0060, 0061, 0074-0092, 0189-0202*).

Again, Applicants have carefully reviewed the Andrews reference, and that application simply does not contain the description of databases, enterprise systems (and their frameworks), rapid development services, and/or developer services, etc. as required in the independent and

one or more intermediate claims. Consequently, Applicants respectfully submit that Andrews does not anticipate all of the elements of claims 168-178. Reconsideration and withdrawal of the rejection are respectfully requested.

The examiner argued that, per claims 179-263, 265-273 and 291-294, they are dependent of claims 1 and disclose inventive concept that are already rejected in claims 1-78. Therefore they are rejected under the same rationale.

Applicants arguments regarding claims 1-178 are equally applicable, and are herein made with the previous force and effect to traverse the rejection of claims 179-263, 265-273 and 291-294. It is respectfully submitted that the Andrews reference, does not describe or references databases, enterprise systems (and their frameworks), rapid development services, and/or developer services, etc. as required in the independent and one or more intermediate claims. Consequently, Applicants respectfully submit that Andrews does not anticipate all of the elements of claims 179-263, 265-273 and 291-294. Reconsideration and withdrawal of the rejection are respectfully requested.

All remarks are made in a good faith effort to advance the prosecution on the merits. Applicants reserve the right to subsequently take up prosecution on the claims as originally filed in this or appropriate continuation, continuation-in-part and/or divisional applications.

Applicants respectfully submit that no amendments have been made to the pending claims for the purpose of overcoming any prior art rejections that would restrict the literal scope of the claims or equivalents thereof. All amendments have been made to remedy rejections under 35 U.S.C. §112 and claim objections cited by the examiner in the last-mailed

Office Action. Applicants respectfully submit that antecedent basis for the claims and amendments thereto can be found throughout the specification.

Applicants respectfully request that the remarks submitted herein be entered, and further request reconsideration in light of the remarks contained herein. Applicants respectfully request withdrawal of the rejections and objections, and that there be an early notice of allowance.

SUMMARY

In light of the above remarks and amendments, reconsideration and withdrawal of the outstanding restriction requirement are respectfully requested. It is further submitted that the application is now in condition for allowance and early notice of the same is earnestly solicited. Should the Examiner have any questions, comments or suggestions in furtherance of the prosecution of this application, the Examiner is invited to contact the attorney of record by telephone, facsimile or electronic mail, as below.

Applicant believes that a fee is due for the cancellation of claims in association with the filing of this Response. However, should the Commissioner deem that any fee is due, including any fees for any extensions of time, Applicant respectfully requests that the Commissioner accept this response as a Petition therefore, and directs that any fees be charged to Baker Botts L.L.P. Deposit Account Number 02-0383, Order Number 065734.0139

Respectfully Submitted,

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